

Exhibit 34

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2 Q. Do you remember having a role in hiring
3 anybody in sales to perform the functions that had
4 been performed in Miami, Chicago, and Minneapolis?

5 A. The hiring process at that time changed
6 widely.

7 Q. The question is did you --

8 A. I would not have participated in the
9 hiring process anymore in general.

10 Q. You would have known about it though,
11 wouldn't you?

12 A. Yes, probably even signed the letter of
13 hiring, but I don't remember.

14 Q. But you can't remember the name of a
15 single person who was hired?

16 MR. KOCHAN: Objection.

17 Q. In sales.

18 A. I don't remember.

19 Q. Okay. Do you know if people who were
20 eligible for the package, that is, when I say, "the
21 package," I mean the early-retirement programs, of
22 which there were three; I think you have discussed
23 those in the past, correct? Yes?

24 A. Three as long as I have been there.

25 Q. Yes, who were eligible for any of those

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2 three programs who did not take them and who were
3 not fired?

4 A. Would you repeat that?

5 (Pending question was read.)

6 A. Well, Angela Ross is one, Linda is one.

7 Q. That would be Linda Lopez?

8 A. Linda Lopez. Abbott.

9 Q. Merylin Abbott?

10 A. Merylin Abbott, and others.

11 Q. Many others, yes?

12 A. Not that many, but quite a few.

13 Q. Okay. Who hired George Brtalik, do you
14 know?

15 A. Mr. Mariani.

16 Q. Mr.?

17 A. Mariani.

18 Q. All right. Who was he?

19 A. He was sales manager, USA.

20 Q. And Mr. Brtalik was a sales manager as
21 well?

22 A. Yes, for a geographical portion.

23 Q. What geographical portion?

24 A. I believe New York.

25 Q. For New York. Do you know if he was